



AMERICAN SOCIETY OF  
PLASTIC SURGEONS®



THE PLASTIC SURGERY  
FOUNDATION®

Executive Office

444 East Algonquin Road • Arlington Heights, IL 60005-4664

847-228-9900 • Fax: 847-228-9131 • [www.plasticsurgery.org](http://www.plasticsurgery.org)

September 23, 2019

Samie Patnode  
Oregon Health Licensing Office  
1430 Tandem Ave., NE Suite 180  
Salem, OR 97301

**RE: Proposed changes to Oregon Administrative Rules Chapter 817**

Dear Ms. Patnode:

I am writing on behalf of the American Society of Plastic Surgeons (ASPS) regarding the proposed changes to chapter 817 of the Oregon Administrative Rules (OAR). We represent more than 93 percent of all board-certified plastic surgeons in the United States – including 87 board-certified plastic surgeons in Oregon. Our mission is to advance quality care for plastic surgery patients and promote public policy that protects patient safety.

While chemical peels are extremely safe and effective when used by medical professionals with appropriate training and oversight, they can cause painful burns and permanent scarring in the wrong hands. Even when used per the manufacturer's recommended guidelines, these chemicals can cause profound skin injury. Therefore – for patient safety and quality outcomes – it is critical that all medium and deep medical peels are performed either by board-certified plastic surgeons or by medical professionals under physician supervision.

While we are aware that Oregon allows “advanced” estheticians – who are not medical professionals – to perform certain chemical peels under physician supervision, we appreciate the Oregon Health Authority's willingness to remove medium to deep chemical peels from general esthetician scope of practice as it is a step in the right direction toward increased patient safety. Furthermore, we believe the definitions of superficial and very superficial peels are appropriate as they ensure that estheticians will not be penetrating layers of the skin that only medical professionals have the education and training to treat safely.

We thank you for your commitment to improving patient safety in Oregon. Please do not hesitate to contact Patrick Hermes, Director of Advocacy and Government Relations, at [phermes@plasticsurgery.org](mailto:phermes@plasticsurgery.org) or (847) 228-3331 with any questions or concerns.

Sincerely,

Alan Matarasso, MD, FACS  
President, American Society of Plastic Surgeons